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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

NATIONAL TPS ALLIANCE, DENIS  
MOLINA, JHONY SILVA, MARIA  
ELENA HERNANDEZ, O.C., SANDHYA  
LAMA, S.K., TEOFILO MARTINEZ,

Plaintiffs,

vs.

KRISTI NOEM, in her official capacity as  
Secretary of Homeland Security, UNITED  
STATES DEPARTMENT OF HOMELAND  
SECURITY, and UNITED STATES OF  
AMERICA,

Defendants.

Case No. 3:25-cv-05687-TLT

**DECLARATION OF ANIL JUNG SHAHI IN  
SUPPORT OF PLAINTIFFS' MOTION FOR  
PARTIAL SUMMARY JUDGMENT**

Assigned to: Hon. Trina L Thompson

Date: November 18, 2025

Time: 2:00 p.m.

Place: Courtroom 9

Complaint Filed: July 7, 2025

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**DECLARATION OF ANIL JUNG SHAHI**

I, Anil Jung Shahi, declare:

1. I have personal knowledge of the facts set forth in this declaration, which details the experiences and harms suffered by Nepali TPS holders.

2. I am the founding coordinator of United for Temporary Protected Status Nepal (UTPSN). UTPSN is a non-partisan, nonprofit organization registered under Section 501(c)(3) of the Internal Revenue Code and incorporated in the State of New York. UTPSN was founded in March 2025 with a mission to protect Temporary Protected Status (TPS) for Nepali nationals in the short term and to advocate for a permanent, long-term solution, such as lawful permanent residency, for Nepali TPS holders and their families.

3. UTPSN has a registered membership of over 1,300 Nepali nationals currently or formerly holding TPS. Our members reside in all 50 states of the United States. The organization is entirely volunteer-led and composed of Nepali TPS holders who have a direct and personal stake in the outcome of the litigation concerning the continuation or termination of TPS for Nepal.

4. As an organization composed of Nepali TPS holders, UTPSN and its members are directly and adversely affected by the termination of TPS. The loss of lawful status, income, health coverage, and stability has inflicted widespread harm that undermines the organization's mission and threatens the wellbeing of its members and their U.S.-born children.

**UTPSN SURVEY**

5. Following the termination of TPS for Nepal, UTPSN conducted an informal survey among its membership to assess the scope of harm caused by the termination. The online survey invited our members to answer questions about how their lives, and the lives of their family members, have been affected by both TPS and the termination of Nepal's TPS designation. All contributions were voluntary and freely offered. This declaration describes the results of the online survey.

6. Between September 6 and October 4, 2025, 213 Nepali TPS holders responded to UTPSN's survey. Survey respondents were distributed throughout 29 different states. Their responses reveal how these long-term TPS holders have built lives, homes, careers and families.

1 The results likewise show that, since the termination, a majority of Nepali TPS holders have faced  
 2 severe hardship, including the loss of employment, housing, and/or health insurance. Many can no  
 3 longer provide for their children, manage severe health conditions, or pay their rent or mortgage  
 4 payments. Many describe themselves as overwhelmed by anxiety about their future.

### 5 **Community Profile**

6 7. Nepali TPS holders had TPS for ten years at the time of the termination of Nepal's  
 7 TPS designation. Of the 213 respondents to the survey, nearly half reported living in the U.S. for  
 8 16 years or more.

9 8. Nearly 30% of respondents reported that they owned their own home, including  
 10 nearly 40% of respondents who have lived in the U.S. for 16 years or more.

11 9. One third of respondents have at least one U.S. citizen child, including 17% who  
 12 have more than one U.S. citizen child living with them at home.

13 10. Survey respondents also reported significant contributions to their communities in  
 14 the United States. Over one-third of respondents reported that, prior to the termination, they spent  
 15 multiple hours a week helping to organize community events or volunteering at nonprofits or  
 16 religious institutions, with some spending over ten hours a week volunteering at community  
 17 events.

### 18 **Loss of Employment and Financial Hardship**

19 11. The Nepali survey respondents reported severe financial impacts from the  
 20 termination of TPS, with most reporting losing their jobs. Over 80% of respondents lost all or a  
 21 substantial part of their income following termination. Of these 80% of respondents who lost a  
 22 substantial part of their income, 40% had child dependents at home. Over 60% of respondents  
 23 reported that they now have no income whatsoever, including a majority of those who formerly  
 24 earned over \$60,000 per year working jobs as varied as software engineer, chef, registered nurse,  
 25 social worker, electrical engineer, and accountant, among others. Among those who wholly lost  
 26 their income following the termination are 55% of the survey respondents with children living at  
 27 home. Another 21% of respondents reported losing one-quarter to three-quarters of their income.

28 12. Many Nepali TPS holders who reported losing their jobs following termination also

1 wrote about the attendant harms of that job loss. In narrative responses, at least 16 TPS holders  
 2 wrote that they had lost or were worried about losing their housing. One respondent wrote that  
 3 they “don’t know how to pay mortgage or support [their] family now.” Another wrote that losing  
 4 their job meant that their family was now at “risk of losing our house and our lives here in [the]  
 5 US.” A third wrote that they “had to give up on [their] apartment.” Many others reported that they  
 6 now live on finite savings; that they were the only source of income for their family; and that they  
 7 now struggle to afford housing, food, and other basic necessities.

8 13. Over 10% of respondents reported that they owned a small business prior to the  
 9 termination, including beauty salons, pet stores, and convenience stores. Approximately half of  
 10 these respondents have since had to sell their businesses due to the termination.

#### 11 **Loss of Health Insurance and Medical Hardship**

12 14. Nearly sixty percent of respondents also reported that they had lost their health  
 13 insurance following the termination. Of these respondents, roughly half reported that the  
 14 termination resulted in the loss of health insurance for other family members as well.

15 15. Many respondents elaborated on this loss of coverage in narrative responses, with  
 16 over twenty respondents describing severe medical conditions that they or their family members  
 17 have whose treatment has been interrupted by termination. One wrote that they are expecting a  
 18 baby but have lost health coverage. Another wrote that their one-year-old U.S. citizen son “has a  
 19 critical health condition and requires regular blood transfusions,” and “his life depends on constant  
 20 medical check up[s] and doctor’s visits[, b]ut because of the uncertainty around [their] legal status  
 21 and insurance coverage, his appointments have been canceled.” A third wrote that their “child is  
 22 missing his therapy sessions because [they] lost [their] job and no longer have insurance.” Yet  
 23 another wrote that they “have kidney failure issues and [are] doing [their] dialysis in Seattle and  
 24 waiting for kidney donors.”

25 16. Over one-tenth of respondents reported that their children rely on long-term,  
 26 specialized medical care which has been interrupted, or where there is a threat of interruption due  
 27 to the termination. For instance, five different respondents noted, the termination of TPS is  
 28 particularly disruptive for parents of autistic children. One parent of an autistic child wrote that

1 “the loss of health insurance ... ended [their] autistic child’s therapies ([applied behavior analysis],  
 2 speech, and occupational).” Another parent – who has lost their job following termination – wrote:  
 3 “Our older son is autistic and non-verbal. Our biggest fear is for our son not being able to get him  
 4 the necessary therapy and support.”

### 5 **Emotional Impact of Loss of TPS**

6 17. Approximately one-quarter of survey respondents reported that they have been  
 7 effectively immobilized by fear resulting from the termination. Fourteen respondents (7% of all  
 8 respondents) reported that they are now scared to drive, go outside, see friends, and/or go to the  
 9 store. Others wrote that they are afraid to go outside even for emergencies. 41 respondents (19%  
 10 of all respondents) reported that they are afraid of getting detained, deported, or stopped by ICE  
 11 officers.

12 18. Nepali TPS holders almost universally reported feeling severe stress and other  
 13 psychological impacts since the termination. All but seven of the respondents (97% of all  
 14 respondents) reported increased stress and/or anxiety due to the termination. 77% reported that  
 15 they were increasingly having trouble concentrating.

16 19. 56% of respondents with children at home reported that the termination was having  
 17 an emotional impact on their children.

18 20. In narrative responses, many respondents elaborated further on these harms, with  
 19 many describing overwhelming fear, anxiety, and terror. One wrote: “Losing TPS has completely  
 20 shaken the foundation of my life and my family’s sense of security and stability. I fear losing the  
 21 community and home we have built here, and the possibility of being forced to abandon  
 22 everything we have worked so hard for. I live with constant fear, and I am even scared to go  
 23 outside.” Another respondent described “overthinking, sleepless nights and just pure terror.”

### 24 **INDIVIDUAL ACCOUNTS**

25 21. I spoke with several survey respondents to learn more about their individual  
 26 circumstances. They described significant financial and medical hardships and emotional distress  
 27 to themselves as well as their family members, including U.S. citizen children. Several described  
 28 their efforts to obtain other immigration status, such as student visas or employment-based

1 petitions and how the sudden termination of TPS rendered them newly ineligible. All expressed  
2 fear, anxiety, and uncertainty about their futures.

3 **Rajbin Shrestha, New Jersey IT Analyst, Father, and Founding Coordinator and Board**  
4 **Member of UTPSN**

5 22. Rajbin Shrestha came to the U.S. in 1997, and has lived here for nearly 28 years.  
6 He and his wife have had TPS since 2015, and they have three children, all of whom are U.S.  
7 citizens. They own a home and have been paying a mortgage.

8 23. Mr. Shrestha was until recently an IT analyst at a real estate firm. His wife worked  
9 as a production assistant for a jewelry company. However, after losing TPS, Mr. Shrestha and his  
10 wife both lost their jobs because they no longer had work authorization. They are using their  
11 savings to pay for their mortgage, but they've been struggling to make ends meet. They also lost  
12 their health insurance, and are trying to navigate enrolling in the health marketplace, but will  
13 struggle to pay for insurance out of pocket.

14 24. Mr. Shrestha and his family cannot return to Nepal because of the worsening  
15 political situation in the country. Additionally, his oldest daughter is starting college in the U.S.  
16 next year, and his middle daughter will be starting college in 2027. His youngest child is only  
17 seven. None of his children speak Nepali, and his children are scared to live in a country that  
18 they've never been to.

19 25. Since the termination of TPS for Nepal, Mr. Shrestha's children worry about their  
20 parents whenever they leave the house, even if it is just to go to the grocery store or run an errand.  
21 Whenever they are driving, and there happens to be a police car behind them, the whole family  
22 tenses up and gets scared that they are going to get pulled over and that Mr. Shrestha and his wife  
23 will get deported. If Mr. Shrestha is out of the house and doesn't answer his phone when one of  
24 his daughters calls him, they get very anxious that he's being held by ICE.

25 26. "We have built a life and raised our families in this country, and this is our home,"  
26 Mr. Shrestha said.

27 **S.B., a California Nurse**

28 27. S.B. is a TPS holder who has lived in the United States for 18 years. She graduated

1 from college in the United States and became a registered nurse in 2020. She worked in a medical  
2 surgery unit in Boston, Massachusetts before moving to California with her family. S.B. lives with  
3 her husband and their niece, whom they support.

4 28. Following the termination of TPS, S.B. lost her job as a nurse. She was the primary  
5 breadwinner for her family and the loss of income is causing severe economic hardship for the  
6 family. S.B. doesn't have enough money for transportation, and they are struggling to pay rent and  
7 purchase basic necessities on her husband's income alone.

8 29. S.B. has a valid, approved I-140 visa petition filed by her employer. This  
9 employment-based visa petition would ultimately provide S.B. a pathway to lawful permanent  
10 residence. Based on this petition, S.B. was on track to be eligible for a green card around January  
11 2026. However, the loss of her TPS status and associated work authorization immediately  
12 rendered her ineligible to adjust her status and secure a green card via this petition, bringing her  
13 years-long effort to obtain permanent status to an abrupt end.

14 30. S.B. lost her health insurance when TPS was terminated for Nepal. She has been  
15 forced to forgo crucial medical care as a result. Around the same time that she lost her TPS and  
16 health insurance, she discovered that she was pregnant. This was welcome news to S.B. and her  
17 husband, who dream of starting a family. Several weeks later, she suffered a miscarriage. Due to  
18 her lack of insurance, S.B. went through the miscarriage alone at home, describing the experience  
19 as painful and highly traumatic. "I knew I should see a doctor," she said, "but I can't afford it."  
20 Instead, she is relying on her own medical training to monitor herself for any signs of infection or  
21 complications.

22 **S.P., a North Carolina Cybersecurity Professional and Mother of an Autistic Son**

23 31. S.P. has lived in the United States for 15 years. She resides in North Carolina with  
24 her husband, who is also a TPS holder from Nepal, and their 7-year-old U.S. citizen son. Their son  
25 is autistic and has significant developmental delays.

26 32. Prior to the termination of TPS, S.P. and her husband were both employed in cyber-  
27 security; she worked for a major insurance company and he for a national telecommunications  
28 company. The family was economically stable, and they were beginning the process of purchasing



1 their first home. With the loss of TPS, both S.P. and her husband lost their jobs. They now have no  
2 income and have been spending their limited savings. They have also lost their employer-  
3 sponsored health care.

4 33. S.P.'s U.S. citizen son was previously receiving 40 hours of one-on-one therapy for  
5 his significant developmental delays. This therapy was covered in large part by their health  
6 insurance. Now uninsured, they cannot afford therapy for their son. They enrolled their son in  
7 public school, which does not have sufficient resources to provide him with the individualized  
8 care that he needs. S.P. reports that her son refuses to eat while at school and comes home very  
9 agitated, though he is unable to communicate what is wrong.

10 34. S.P. reports being afraid to leave the house, worried that ICE agents will detain or  
11 deport her. "I wake up with a pit in my stomach every day," she said. "I don't know what we will  
12 do. Every day feels harder than the one before."

13 **S.S., a California Business Analyst and Mother**

14 35. S.S. came to the United States on a student visa in 2009. She graduated with a  
15 degree in business administration. After graduation, when the earthquake devastated Nepal and the  
16 country was designated for TPS, S.S. applied for TPS. Since then, she has worked as a business  
17 analyst for a consulting company.

18 36. S.S. lives in California with her husband and their two daughters, aged 7 and 5. Her  
19 older daughter is autistic and is completely non-verbal. She requires intensive supervision and  
20 one-on-one care. The specialists tell the family to take each day at a time, and that the most  
21 important thing is to maintain a steady routine. The termination of TPS has upended the family's  
22 entire life.

23 37. S.S. lost her job when TPS was terminated. While working, S.S. was able to  
24 comfortably provide for her family, but now she feels helpless and constantly worried about the  
25 future. Her husband works as a delivery and rideshare driver, and his income is unpredictable and  
26 insufficient to support their family of four.

27 38. S.S.'s daughter was receiving 20 hours of Applied Behavior Analysis (ABA)  
28 therapy weekly, but her treatment was disrupted when the family lost their health insurance due to

1 the termination of TPS.

2 39. S.S. is terrified of being detained and deported, and of being separated from her  
3 children. The specialized services that her daughter needs are not readily available in Nepal. Her  
4 quality of life would be severely restricted in Nepal, which has grown increasingly unstable and  
5 dangerous in recent weeks. The family could not relocate there.

6 **A.M., a Maryland Investment Operations Director**

7 40. A.M. is a TPS holder who has lived in the U.S. for 13 years. He initially arrived as  
8 a student and obtained an undergraduate degree in finance. He resides in Maryland with his  
9 younger sister, a U.S. citizen whom he supports, and his wife, who is on a student visa.

10 41. A.M. worked as an operations director for an investment bank, a position he had  
11 held for over 9 years. His income comfortably supported his sister and his wife, as well as his  
12 parents in Nepal. In 2022, he purchased a home.

13 42. When the TPS termination went into effect, A.M. was placed on unpaid leave from  
14 his work and within three weeks was fired from his job solely due to the loss of work  
15 authorization. A.M. is now living off his savings and in a state of limbo.

16 43. He is attempting to sell his house because he does not see how he could pay his  
17 mortgage.

18 44. He has been struggling emotionally with the uncertainty of how he will continue to  
19 live and support himself and his family.

20 45. A.M. has sought to apply for another status which would allow him to remain in the  
21 United States and continue to work legally. However, the manner in which the terminations have  
22 gone into effect has made that nearly impossible for him. "I've been trying everything I can think  
23 of to stay in lawful status," says A.M. "But it feels like every door is being slammed shut in my  
24 face."

25 **S.T., North Carolina Product Manager and Mother**

26 46. S.T. has lived in the United States for over ten years. Her now-husband first moved  
27 to North Carolina from Nepal in 2007, and S.T. moved to North Carolina to be with him. They  
28 married in 2019. S.T.'s husband is also a TPS holder. S.T. is a product manager at an insurance

1 company, and her husband is a service and support analyst for AT&T. However, both S.T.'s and  
2 her husband's employers told them that they will be laid off on November 18, 2025, if they cannot  
3 provide updated work authorization.

4 47. S.T. and her husband have a three-year-old daughter, who has autism and is non-  
5 verbal. She needs a lot of specialized behavioral and speech therapy, and S.T. is her primary  
6 caretaker. S.T. is very anxious about the prospect of moving back to Nepal because the country  
7 does not have as many services for children with autism.

8 48. S.T. is at risk of losing her health insurance if her employer terminates her due to  
9 lack of work authorization. S.P. has to receive many injections for back issues, which have  
10 required her to be on bed rest for months at a time. However, without insurance, she is worried  
11 that she will not be able to continue paying for the injections.

12 **S.S., New York Medical Devices Designer and Father**

13 49. S.S. came to the United States in 2008 on a student visa. He studied electrical  
14 engineering and completed a master's degree in engineering. He had been working at a medical  
15 devices company until TPS was terminated in August.

16 50. S.S. lives in New York with his wife and two daughters, who are four and two and  
17 were born in the United States, as well as his parents who have green cards. His wife has TPS as  
18 well, but she filed for asylum, due to a fear of political persecution in Nepal because of her  
19 family's connections to an opposing political party, and she is awaiting a hearing. S.S.'s sister is  
20 also a U.S. citizen and lives nearby in New York.

21 51. S.S. had been working with his company to apply for a green card through his  
22 work, and the process was going to be done in a few months. However, his company had to lay  
23 him off when his TPS was terminated and he lost his employment authorization. Although his  
24 company will continue sponsoring the green card process, because S.S. does not have valid  
25 immigration status, he is at risk of being ineligible for the green card. "I was so close to having a  
26 green card," S.S. said. "If I'd been able to have TPS for a few more months, I could've finally had  
27 the green card, but now that seems impossible."

28 52. S.S. has thought about whether he could go back to Nepal, but his wife could not

1 return with him because of her fear of political persecution. S.S. cannot imagine returning to Nepal  
 2 without his wife and children, and leaving them alone in the United States.

3 **N.S., New York Mother and Part-Time Delivery Driver**

4 53. N.S. is a TPS holder who has lived in the United States for 14 years. She initially  
 5 came as a student, and since registered for TPS. She lives in New York with her lawful permanent  
 6 resident husband and their two U.S. citizen children, aged six and three. Her husband's mother and  
 7 brother are U.S. citizens.

8 54. N.S. is the primary caretaker for her two young children, though she has also  
 9 delivered food part-time for Grubhub as the flexibility is compatible with her caretaking  
 10 responsibilities. Now that N.S. lost TPS, she can no longer work for Grubhub. Her husband drives  
 11 for Uber, but the income is not stable, so they are very worried about their finances. "We are just  
 12 trying to survive at this point," N.S. said.

13 55. N.S.'s youngest child has autism, and she currently receives ABA therapy, and  
 14 speech and occupational therapy. In January, N.S.'s youngest child is scheduled to start a special  
 15 education program. N.S. and her husband have thought about returning to Nepal, but are worried  
 16 because the country does not have access to the same autism therapies that her U.S. citizen  
 17 daughter has access to in the United States. N.S.'s daughter has just started making a lot of  
 18 progress with her autism therapies over the past eighteen months, and if they had to move back to  
 19 Nepal, N.S. is worried that she would regress.

20 56. N.S. also does not have health insurance anymore, since she lost her job. She has an  
 21 upcoming appointment to receive a new dose of birth control shots, but she said that she will have  
 22 to cancel it, because she cannot pay for the shots without insurance.

23 57. N.S. said that she does not feel safe going outside. When she goes to pick up her  
 24 daughter from school, she has crippling anxiety while she waits in the car.

25 **B.S., a Maryland Student and New Father**

26 58. B.S. has lived in the United States for almost fourteen years. He first came to the  
 27 United States as a student and studied computer science. He had TPS since 2016 following the  
 28 devastating earthquake in Nepal, but lost his TPS when Nepal's TPS designation was terminated.

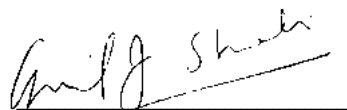
1 For the last decade, he has primarily worked in restaurants. He recently began continuing his  
2 studies for a master's in computer science, and has a valid student visa. While his student visa  
3 provides him valid legal status to remain in the United States, it does not authorize him to work.

4 59. B.S. resides in Maryland with his elderly legal permanent resident parents, his  
5 partner, and their newborn baby. Up until TPS was terminated, B.S. was the primary breadwinner  
6 for his family. His partner recently gave birth and cannot work because she is caring for their  
7 infant. Because neither B.S. nor his partner can work, they have to use their savings to pay the  
8 mortgage on their house, health insurance, and school fees.

9 60. B.S. also supports his parents. His father was diagnosed with oral cancer and has  
10 just completed chemotherapy and radiation therapy. He is recovering now and requires constant  
11 care. If B.S.'s father requires more treatment next year, B.S. will struggle to cover the treatment  
12 costs.

13 61. A few months ago, ICE agents came to the house where B.S. lives with his family  
14 and detained his girlfriend, an immigrant from El Salvador, who was six months pregnant at the  
15 time. They ultimately released her, but B.S. lives in constant fear that his girlfriend will be taken  
16 by ICE again, and they are scared to leave the house together.

17  
18 I declare under penalty of perjury that the foregoing is true and correct, and that this  
19 declaration was executed in New Jersey, this 13th day of October, 2025.

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23 Anil Jung Shahi  
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